



May 19, 2006

Docket Clerk,  
Fruit and Vegetable Programs  
AMS USDA  
1400 Independence Avenue, SW  
Stop 0243  
Washington, DC 20250-0243

Fax: (202) 690-0102

Comments on Specialty Crop Block Grant Program  
[Docket No. FV06-1290-1 PR]

Dear Sirs:

The Florida Fruit & Vegetable Association (FFVA) submits these comments on the subject notice referenced above. FFVA is a producer organization that represents growers, packers, and shippers of citrus, vegetables, tropical fruit, sugarcane and other agricultural commodities.

FFVA strongly supports an expedited implementation process for allowing the Specialty Crop Block Grant Program to enhance long-term competitiveness and sustainability of U.S. specialty crops. Additionally, FFVA believes that safeguards must be established to ensure that program funding reach the intended stakeholders and will not supersede existing state or federal programs dedicated to enhancing specialty crop competitiveness.

Research and training programs represent a sound investment in enhancing the sustainability and competitiveness of Florida's fruit and vegetable industry. FFVA urges USDA to give earnest consideration to targeted research initiatives when assessing competitive benefits for the purpose of block grants. Combating invasive pests and diseases, food safety, fostering enhanced varieties, reducing input costs and protecting the environment are all vital to Florida's produce industry, and should be priorities for block grant funding.

Further, Florida's fruit and vegetable industry relies on marketing, promotion and nutrition programs to remain competitive in a global marketplace. Such programs should be afforded strong consideration for block grant funding.

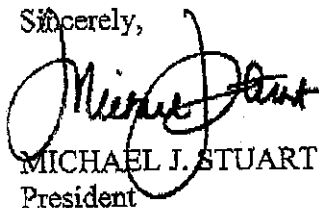
In determining the impact and benefits of these funded projects, FFVA asks USDA to consider the long-term enhancements, rather than judging projects on a relatively brief timeframe. It is understandably difficult for USDA to accurately measure the efficacy and immediate value of food safety, food security, research or SPS-related projects. USDA should also consider how such projects enhance the fruit and vegetable industry's long-term infrastructure when measuring competitive impact.

In like fashion, FFVA supports USDA's proposal to allow for projects of up to 3 years in length. Such an approach takes into account the timeframe often required for many worthy projects.

FFVA urges USDA to use diligent oversight of state plans to ensure that block grants meet the standard of "enhancing the competitiveness of specialty crops." USDA should require states to demonstrate how they will administer the block grants, including details for the project selection process. At the same time, states should be granted flexibility in project selection and administration, to best allow for meeting local needs, as long as the overarching goals of "enhancing competitiveness" are met.

Thank you for the opportunity to present our comments. If you have any questions or need additional information, please contact me.

Sincerely,



MICHAEL J. STUART  
President